

### **REMARKS/ARGUMENTS**

Prior to entry of this amendment, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-46 were pending in this application. Claims 1, 14, 24, and 39 have been amended, no claims have been added, and no claims have been canceled herein. Therefore, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-46 are now pending in this application. The Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

#### **Examiner Interview**

An Interview was conducted on October 17, 2007 between Examiner Rutledge, Kim Kanzaki a representative of the Applicants, and William Daley the undersigned. As an initial matter, the Applicants and the undersigned thank the Examiner for the kind and courteous Interview. The substance of this Interview was a comparison of elements of the pending claims and the prior art of record upon which the current rejections are based. Rather than restate these comparisons here, it is noted that the arguments presented below are essentially the same as those presented to the Examiner in the Interview.

Additionally, Examiner Rutledge kindly suggested amendments to help clarify the meaning of the recited claim elements. More specifically, examiner Rutledge suggested that claim 1 be amended to indicate that the recited elements of reporting a plurality of workflows to a user and receiving from the user a selection of a workflow are performed via a Graphical User Interface. Such an amendment to claim 1 has been presented herein. Similar amendments have been made to the other pending independent claims. Support for these amendments can be found for example on page 46, line 18 through page 47, line 10 of the present application. The Applicants respectfully request reconsideration of the pending claims in light of these amendments and the following remarks.

**35 U.S.C. §103 Rejection, Du in view of SiteMinder**

Claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36, and 39-46 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,041,306, to Du et al. (hereinafter "Du") in view of *SiteMinder Policy Server Operations Guide, Version 4.0, Netegrity Inc., published 1997* (hereinafter "SiteMinder"). The Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. More specifically, neither reference, alone or in combination, teaches or suggests performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim.

As noted previously, the cited portions of SiteMinder relate to policies and policy domains (p.235-237 and 325-328) and responding to requests for resources (p. 301-304). Under SiteMinder, policies, which may be grouped together into policy domains, control a user's access to resources. Resource within a policy domain, i.e., a resource to which a policy domain applies, can be further grouped into realms. Access to a requested resource is then controlled by rules defined for the realm that contains the requested resource. (See pages 235 and 325) That is, under SiteMinder, an administrator defines a registration rule for a particular realm. The rule is applied to control access to the resource based on the realm that contains the resource. However, the cited portions of SiteMinder do not teach or suggest reporting a plurality of workflows to a

user and receiving a user selection of a workflow from a plurality of workflows to affect a target identity profile. Rather, under the cited portions of SiteMinder, the user is forced to use whatever rule the administrator defines for the realm containing the requested resource.

Du is directed to "a system and method for performing flexible workflow process execution in a distributed workflow management system." (Col. 2, lines 59-61) Under Du "the distributed workflow management system is formed by a computer network comprising a plurality of computers." (Col. 3, lines 1-3) "A workflow process management system operates on one or more of the computers to control the computer network in executing the workflow process." (Col. 3, lines 4-7) "Each workflow process includes a sequence of activities, each of which is ordinarily performed by one of the computer systems." (Col. 4, lines 34-36) "The WFPM system provides procedural automation of the workflow process by managing the sequence of process activities and the invocation of appropriate user, machine or microprocessor-controlled device resources associated with the various activity steps." (Col. 4, lines 51-56) That is, Du teaches controlling distribution of processing of tasks between a number of computers in a network. Du's stated purpose for distributing these tasks is load balancing, i.e., to prevent overloading or excess idle time of resources. (See col. 2, lines 46-51) However, Du does not teach or suggest reporting a plurality of workflows to a user and receiving a user selection of a workflow from a plurality of workflows to affect a target identity profile. Rather, Du teaches an automated process of distributing tasks between a number of computers in a network to achieve load balancing.

The combination of references is no more relevant to the pending claims than either reference alone since neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. Rather Du teaches an automated process of distributing tasks between a number of computers in a network while the cited portions of SiteMinder teach

policies for controlling access to user profiles or other resources where the user is forced to use whatever policy the administrator defines for the realm containing the user profile.

Claim 1, upon which claims 2-11, 13, and 34-36 depend, claim 14, upon which claims 15-21 and 23 depend, and claim 24, upon which claims 25-31 and 33 depend, each recite in part "identifying a plurality of workflows that perform said task and are associated with groups that include said target identity profile, said plurality of workflows includes said first workflow, reporting said plurality of workflows to a user via a Graphical User Interface (GUI), receiving from the user via the GUI a selection of said first workflow from the plurality of workflows, and performing one or more steps of said first workflow." Neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. Rather Du teaches an automated process of distributing tasks between a number of computers in a network while the cited portions of SiteMinder teach policies for controlling access to user profiles or other resources where the user is forced to use whatever policy the administrator defines for the realm containing the user profile. For at least these reasons, the rejection is improper and claims 1-11, 13-21, 23-31, and 33-36 should be allowed.

Similarly, claim 39, upon which claims 40-46 depend, recites in part "identifying a plurality of workflows that perform the task and are associated with groups that include the user associated with the target identity profile; reporting the plurality of workflows via a Graphical User Interface (GUI) in response to the request; receiving a user selection of a first workflow from the plurality of workflows via the GUI and performing a first step of said first workflow with a first program to affect the target identity profile." Neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. Rather Du

teaches an automated process of distributing tasks between a number of computers in a network while the cited portions of SiteMinder teach policies for controlling access to user profiles or other resources where the user is forced to use whatever policy the administrator defines for the realm containing the user profile. For at least these reasons, the rejection is improper and claims 39-46 should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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